

ORIGINAL

**MCWHIRTER REEVES**  
ATTORNEYS AT LAW

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PLEASE REPLY TO:  
  
TALLAHASSEE

TALLAHASSEE OFFICE:  
117 SOUTH GADSDEN  
TALLAHASSEE, FLORIDA 32301  
(850) 222-2525  
(850) 222-5606 FAX

January 30, 2004

**VIA HAND DELIVERY**

Blanca S. Bayo, Director  
Division of Records and Reporting  
Betty Easley Conference Center  
4075 Esplanade Way  
Tallahassee, Florida 32399-0870

Re: Docket No.: 030852-TP

Dear Ms. Bayo:

On behalf of DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), enclosed for filing and distribution are the original and 1 copy of the following:

- ▶ Notice of Service of DIECA Communications, Inc. d/b/a Covad Communications Company's First Request for Production of Documents to BellSouth Telecommunications, Inc. (No. 1)

Please acknowledge receipt of the above on the extra copy and return the stamped copy to me. Thank you for your assistance.

Sincerely,

RECEIVED & FILED  
*[Signature]*  
EPSC-BUREAU OF RECORDS

*[Signature]*

Timothy J. Perry

RECEIVED EPSC  
JAN 30 PM 4:07  
COMMISSION  
CLERK

AUS	_____	
CAF	_____	
CMP	_____	TJP
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OTH	_____	

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising  
From Federal Communications Commission's  
Triennial UNE review; Location-Specific  
Review for DS1, DS3 and Dark Fiber Loops,  
And Route-Specific Review for DS1, DS3 and  
Dark Fiber Transport.

Docket No. 030852-TP

Filed: January 30, 2004

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**NOTICE OF SERVICE OF DIECA COMMUNICATIONS, INC. D/B/A COVAD  
COMMUNICATIONS COMPANY'S FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS TO BELLSOUTH TELECOMMUNICATIONS, INC. (NO. 1)**

DIECA Communications, Inc., d/b/a Covad Communications Company, files Notice that it has served its First Request for Production of Documents (No. 1) to BellSouth Telecommunications, Inc., by hand delivery to: Nancy White, c/o Nancy Sims, 150 South Monroe Street, Suite 400, Tallahassee, Florida 32301, on this 30th day of January 2004.



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Charles Watkins  
Senior Counsel  
Covad Communications Co.  
1230 Peachtree Street, N.E., 19<sup>th</sup> Floor  
Atlanta, Georgia 30309  
(404) 942-3494  
(404) 942-3495 (fax)  
[gwatkins@covad.com](mailto:gwatkins@covad.com)

*for* Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin, Davidson,  
Kaufman & Arnold, P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301  
(850) 222-2525  
(850) 222-5606 (fax)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)

Attorneys for DIECA Communications, Inc.  
d/b/a Covad Communications, Company

DOCUMENT NUMBER-DATE

## CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Notice of Service of DIECA Communications, Inc., d/b/a Covad Communications Company's First Request for Production of Documents to BellSouth Telecommunications, Inc. (No. 1) has been provided by (\*) hand delivery, (\*\*) email and U.S. Mail this 30th day of January 2004, to the following:

(\*) (\*\*) Adam Teitzman, Staff Counsel  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

(\*\*) Tracy Hatch  
AT&T Communications of the  
Southern States, LLC  
101 North Monroe Street  
Suite 700  
Tallahassee, Florida 32301

(\*) (\*\*) Nancy White  
c/o Nancy Sims  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Suite 400  
Tallahassee, Florida 32301-1556

(\*\*) Michael Gross  
Florida Cable Telecommunications  
246 East 6<sup>th</sup> Avenue  
Tallahassee, Florida 32302

(\*\*) Richard Chapkis  
Verizon Florida, Inc.  
201 North Franklin Street  
MC: FLTC0717  
Tampa, Florida 33602

(\*\*) Matthew Feil  
Florida Digital Network, Inc.  
390 North Orange Avenue, Suite 2000  
Orlando, Florida 32801

(\*\*) Susan Masterton  
Sprint Communications Company  
1313 Blairstone Road  
Post Office Box 2214  
MC: FLTLHO0107  
Tallahassee, Florida 32301

(\*\*) Jeffrey J. Binder  
Allegiance Telecom, Inc.  
1919 M Street, NW  
Washington, DC 20037

(\*\*) Donna Canzano McNulty  
MCI WorldCom  
1203 Governors Square Boulevard  
Suite 201  
Tallahassee, Florida 32301

(\*\*) Floyd R. Self  
Messer, Caparello & Self  
215 South Monroe Street, Suite 701  
Tallahassee, FL 32301

(\*\*) Norman H. Horton, Jr.  
215 South Mornoe Street  
Tallahassee, Florida 32302-1876

(\*\*) Nanette Edwards  
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4092 S. Memorial Parkway  
Huntsville, Alabama 35802

(\*\*) Jake E. Jennings  
Senior Vice-President  
Regulatory Affairs & Carrier Relations  
NewSouth Communications Corp.  
NewSouth Center  
Two N. Main Center  
Greenville, SC 29601

(\*\*) Jon C. Moyle, Jr.  
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& Sheehan, P.A.  
The Perkins House  
118 North Gadsden Street  
Tallahassee, FL 32301

(\*\*) Bo Russell  
Vice-President  
Regulatory and legal Affairs  
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301 North Main Street  
Greenville, SC 29601

(\*\*) Rand Currier  
Geoff Cookman  
Granite Telecommunications, LLC  
234 Copeland Street  
Quincy, MA

(\*\*) Andrew O. Isar  
Miller Isar, Inc.  
2901 Skansie Avenue, Suite 240  
Gig Harbor, WA 98335

(\*\*) Scott A. Kassman  
FDN Communications  
390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801

  
for Vicki Gordon Kaufman